

**STATEMENT OF BASIS (AI No. 157510)**

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0124559 to discharge to waters of the State of Louisiana.

**THE APPLICANT IS:** Stallion Oilfield Services LTD  
Stallion Heavy Haulers  
Post Office Box 90  
Homer, Louisiana. 71040

**ISSUING OFFICE:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

**PREPARED BY:** Michelle Bickham

**DATE PREPARED:** July 14, 2009

**1. PERMIT STATUS****A. Reason For Permit Action:**

Issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

**B. LPDES permits –**

LPDES permit effective date: N/A

LPDES permit expiration date: N/A

**C. Date Application Received: December 24, 2008****2. FACILITY INFORMATION****A. FACILITY TYPE/ACTIVITY - oilfield truck hauling and maintenance facility**

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Stallion Heavy Haulers is an existing oilfield truck hauling and maintenance facility. The facility services and washes heavy haul trucks used to move oilfield equipment.

**B. FEE RATE**

1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: II
4. SIC code: 1389

**C. LOCATION - 7034 Highway 79, Homer, Claiborne Parish**  
Latitude 32° 52' 41", Longitude 93° 04' 84"

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### 3. OUTFALL INFORMATION

#### Outfall 001

Discharge Type: equipment washwater  
 Treatment: sand/oil separator  
 Location: at the point of discharge from the treatment system located on the northeast corner of the facility  
 Flow: 2000 gpd  
 Discharge Route: local drainage thence to Beaver Creek

#### Outfall 002

Discharge Type: treated sanitary wastewater  
 Treatment: sewage treatment plant including barscreen equalization, aeration, digestion, clarification, and chlorination  
 Location: at the point of discharge from the sewage treatment plant located on the northeast corner of the facility  
 Flow: 2000 gpd  
 Discharge Route: local drainage thence to Beaver Creek

### 4. RECEIVING WATERS

STREAM - local drainage thence to Beaver Creek

BASIN AND SEGMENT - Ouachita River Basin, Segment 080601

DESIGNATED USES - a. primary contact recreation  
 b. secondary contact recreation  
 c. propagation of fish and wildlife  
 d. drinking water supply\*\*

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\*\*As per LAC33:IX.1111.A, this use designation shall apply only to listed water bodies and not to their tributaries or distributaries unless so specified. The discharge from this facility does not go directly to the listed water body.

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### 5. TMDL STATUS

Subsegment 080601 is listed on LDEQ's Final 2006 303(d) List as impaired for dissolved oxygen (EPA - Category 5), color (EPA - Category 5), pathogen indicators, and low pH (EPA - Category 5). To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Ouachita Basin, those suspected causes for impairment which are not directly attributed to the oilfield truck hauling and maintenance facility point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated.

Therefore, the dissolved oxygen, pathogen indicators, and low pH impairments will be addressed in a manner consistent with the Department's permitting guidance for implementing Louisiana's surface water

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quality standards as follows:

Dissolved oxygen

To protect against the discharge of pollutants which may further contribute to the dissolved oxygen impairment cause, a COD limit is being placed on Outfall 001 and a BOD<sub>5</sub> limit is being placed on Outfall 002.

Pathogen Indicators

To protect against the discharge of pollutants which may further contribute to the pathogen indicators impairment cause, a fecal coliform limit is being placed on Outfall 002.

Low pH

To protect against the discharge of pollutants which may further contribute to the low pH impairment cause, pH limits are being placed on Outfalls 001 and 002.

**6. PROPOSED EFFLUENT LIMITS**

BASIS - See Rationale below.

**7. COMPLIANCE HISTORY/COMMENTS**

N/A as this is a new facility.

**8. EXISTING EFFLUENT LIMITS**

N/A

**9. ENDANGERED SPECIES**

The receiving waterbody, Subsegment 080601 of the Ouachita River Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

**10. HISTORIC SITES**

The discharge will be from a proposed facility. LDEQ has consulted with the State Historic Preservation Officer (SHPO) in a letter dated May 7, 2009, to determine whether construction-related activities could potentially affect sites or properties on or eligible for listing on the National Register of Historic Places. SHPO's response letter, dated May 28, 2009, stated that the facility as proposed will have no potential effects.

**11. TENTATIVE DETERMINATION**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

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## 12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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### Rationale for Stallion Oilfield Services LTD

#### 1. Outfall 001 - equipment washwater (estimated flow is 2000 gpd)

| Pollutant            | Limitation       |             | Reference                            |
|----------------------|------------------|-------------|--------------------------------------|
|                      | Monthly Avg      | Daily Max   |                                      |
|                      | mg/L             |             |                                      |
| Flow                 | Report           | Report      |                                      |
| COD                  | 200              | 300         | Similar discharges*, LAG480000 (BPJ) |
| TSS                  | ---              | 45          | Similar discharges*, LAG480000 (BPJ) |
| Oil & Grease         | ---              | 15          | Similar discharges*, LAG480000 (BPJ) |
| Soaps & Detergents   | Inventory Record | ---         | Similar discharges*, LAG480000 (BPJ) |
| Oil & Grease, Visual | ---              | No Presence | Similar discharges*, LAG480000 (BPJ) |
| pH, s.u.             | 6.0 (min)        | 9.0 (max)   | Similar discharges*, LAG480000 (BPJ) |

**Treatment:** sand/oil separator

**Monitoring Frequency:** Daily for Oil and Grease, Visual and quarterly for flow, TSS, COD, oil and grease, and pH at the point of discharge from the treatment system located on the northeast corner of the facility. Soaps and Detergents: document in a quarterly inventory record the quantity and type of any Soap and/or Detergent used during each calendar month.

**Limits Justification:** Limits and monitoring frequencies are based on current guidance for similar discharges from other facilities and the Light Commercial General Permit, LAG480000 effective August 1, 2001.

#### 2. Outfall 002 – treated sanitary wastewater (estimated flow is 2000 gpd)

| Pollutant                     | Limitation  |           | Reference                            |
|-------------------------------|-------------|-----------|--------------------------------------|
|                               | Monthly Avg | Daily Max |                                      |
|                               | mg/L        |           |                                      |
| Flow                          | ---         | Report    |                                      |
| BOD <sub>5</sub>              | 30          | 45        | Similar discharges* (BPJ), LAG530000 |
| TSS                           | 30          | 45        | Similar discharges* (BPJ), LAG530000 |
| Fecal Coliform colonies/100ml | 200         | 400       | Similar discharges* (BPJ), LAG530000 |
| pH, s.u.                      | 6.0 (min)   | 9.0 (max) | Similar discharges* (BPJ), LAG530000 |

**Treatment:** sewage treatment plant including barscreen equalization, aeration, digestion, clarification, and chlorination

**Monitoring Frequency:** Semiannually for all parameters at the point of discharge from the sewage treatment plant located on the northeast corner of the facility

**Limits Justification:** Limits and monitoring frequencies are based on current guidance for similar discharges from other industrial facilities and the Class I Sanitary Discharge General Permit, LAG530000

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effective November 1, 2007.

Note: EPA Guidelines for Metal Products & Machinery (40 CFR Part 438) are applicable; however, more stringent state requirements for exterior equipment washwater are being placed in the permit.

\* Existing permits for similar outfalls  
BPJ Best Professional Judgement  
su Standard Units

#### NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

#### **STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT**

An SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water discharges shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 1389 are considered to have storm water discharges associated with industrial activity.

**For first time permit issuance**, the SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. **For renewal permit issuance**, the SWP3 shall be reviewed and updated, if necessary, within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).

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